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International Specialists in the Environment

## M E M O R A N D U M



TO: File  
FROM: Mark Dunnigan *MD.*  
DATE: May 1, 1991  
SUBJECT: Carstab Corp/Possible Immediate Response Action  
U.S. EPA ID: OHD000724138

FIT believes that the Carstab Corp site warrants an investigation by the Immediate Response Group for the following reasons.

On October 1 and 2, 1990, FIT conducted a Screening Site Inspection (SSI) of the Carstab Corp site located at 2000 West Street, Reading, Ohio. During the inspection, a dry crystalline substance was observed on the east bank of Mill Creek. Mill Creek is immediately adjacent to the west side of the Carstab Corp site. A sediment sample was collected from the area of the dry crystalline substance on the east bank of Mill Creek. This sample was collected outside of Carstab's fenced property, immediately west of the northwest corner of the site (see attached figure). This sample location is also west of six treatment/disposal pits Carstab previously operated on-site. These treatment/disposal pits were dredged and backfilled in 1980.

The following compounds were detected in the aforementioned off-site sediment sample: Carbon disulfide (37J mg/kg), 2 butanone (MEK) (180J mg/kg), ethylbenzene (82J mg/kg), chlorobenzene (54J mg/kg), xylenes (82J mg/kg), 1,2-dichlorobenzene (670J mg/kg), bis(2-chloroisopropyl) ether (280J mg/kg). The background soil sample had no detectable concentrations of the above compounds.

It is unknown where the dry leachate material migrated from. There are two other properties that immediately border the Carstab site to the

north. One of the north border sites is on the NPL and the other has had enforcement-regulatory actions. Furthermore, Carstab Corp installed a slurry wall and french drain system along the north and west sides of their property in order to collect spills and leachate materials (see attached figure).

Further investigations by FIT discovered that one of the city of Reading's municipal wells was ordered closed by the Ohio EPA because of volatile organic contamination (see enclosure). The Carstab Corp site is located in an area designated as a sole source aquifer. Five on-site monitoring wells were sampled during the SSI. All of the wells had contaminants detected in them (e.g., 56 µg/L chlorobenzene, 12 µg/L 1,2-dichlorobenzene, 660 µg/L vanadium). However, FIT cannot project a release of contaminants into groundwater and show evidence of attribution because of the absence of upgradient wells. Possible upgradient monitoring wells located on-site were either dry, damaged or nonexistent at the time of the SSI. On-site monitoring wells are also being eradicated by site operations continuing to be upgraded through construction activities.

FIT believes the following activities should be performed to help mitigate and delineate possible contaminant releases:

1. A more intensive soil/sediment sampling of Mill Creek to determine extent of contamination and possible attribution. Contaminated soil/sediments should be removed from the bank of Mill Creek and replaced with a containment wall. Signs and/or fencing can be installed to discourage/prevent public access to the sediment contaminated area of Mill Creek.
2. Surface water samples can be collected from Mill Creek to delineate and determine extent of possible water contamination.

3. Continuation/resampling of monitoring wells to determine attribution of contaminants from the three properties in the immediate area. Installation of upgradient wells are needed and recommended off of Carstab's property. Alternatively, recent investigations at the NPL site to the north of Carstab may provide suitable upgradient groundwater quality data. Possibly a Geo-probe could be used to sample groundwater (depth from ground surface to water varies from approximately 15 to 20 feet).

cc: Jeanne Griffin

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## Reissuing Permit To Alaska Processors Proposed

The Environmental Protection Agency May 18 proposed to reissue a draft National Pollutant Discharge Elimination System permit for seafood processors in Alaska (54 FR 21470). The draft general permit proposes effluent limits and monitoring and reporting requirements for discharges from seafood processing facilities. Comments on the proposal should be sent to the Regional Administrator, EPA Region X, 1200 Sixth Ave., Seattle, Wash. 98101. For more information, call Ben Cope at (206) 442-1442.

## Alaska Oil, Gas Lease Sale Postponed

Interior Secretary Manuel Lujan May 17 announced postponement of an oil and gas lease sale in the Gulf of Alaska and Cook Inlet until more is known about impacts of the March 24 *Exxon Valdez* spill. "Because the Sale 114 is near an area directly affected by the spill in Prince William Sound, I have asked the Minerals Management Service to delay preparation of an environmental impact statement until more is known about the consequences of the spill and its relationship to this proposed sale," Lujan said in a press statement. A decision to go ahead with the sale, originally scheduled for August 1990, will not be made until some time next year, an MMS spokesman told BNA May 18. The EIS for Sale 114 was scheduled to be published in September 1989, but it also will be delayed. MMS will reopen the sale to public comment if it decides to go ahead with the sale, the MMS spokesman said.

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## STATE BRIEFS

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### Ohio EPA Orders Closing Of Reading Well

CINCINNATI—(By a BNA Staff Correspondent)—The Ohio Environmental Protection Agency May 15 ordered the closing of Reading's largest well, where high levels of 1,2-

dichloroethane were found. Reading, a northern suburb of Cincinnati, was cited for violating the Safe Drinking Water Act and directed to find another water source or adopt a cleanup plan. In a May 15 letter, OEPA told Reading to close all wells with chemical concentrations exceeding federal standards, to begin weekly well monitoring, and to inform its 3,500 water consumers that the potential carcinogen was found. Quarterly testing by OEPA discovered concentrations of the industrial solvent measuring 27.5 parts per billion; the federal allowable limit is 5 ppb, although the recommended limit is zero, OEPA said. Since 1988, five of Reading's wells have been taken off line after toxic chemicals were found. While the source has not been pinpointed, Reading's well field is surrounded by several industries and is adjacent to the Pristine Inc., hazardous waste dump, which is on the superfund national priorities list.

### 'Reasonable' Recycling Efforts Required In Indiana

CINCINNATI—(By a BNA Staff Correspondent)—Indiana state agencies, public colleges and universities, and the judiciary must begin making "reasonable" efforts to recycle paper products as of July 1, under a new law signed by Gov. Evan Bayh. The law (SB 415) stipulates that Indiana will be required to buy recyclable paper products whenever economically feasible and to make efforts to collect the paper it uses for recycling. Money earned from selling paper to recycling companies will be used to establish future waste reduction programs.

### Delaware Lifts Ban On Low-Pressure Septic Pipe

PHILADELPHIA—(By a BNA Staff Correspondent)—A seven-month ban on the installation of low-pressure pipe in on-site septic systems has been lifted by the Delaware Department of Natural Resources and Environmental Control. DNREC said the moratorium was ended effective May 1 after warm weather had substantially reduced soil moisture content. When the use of low-pressure pipe was proscribed in October 1988, DNREC had cited a failure rate of 32 percent in LPP septic systems, compared with an expected failure rate of 5 percent.



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## CONGRESS

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### Senate Bills And Resolutions Introduced

S 1045 May 18, to establish a national environmental policy on the participation of the United States in international financing (Symms and others) to Environment.

S 1066 May 18, to establish a domestic liability and compensation system for oil pollution from vessels and facilities and to implement the 1984 protocols to the 1969 civil liability and 1971 fund conventions concerning seagoing tanker-source oil pollution (Chafee, by request) to Environment.

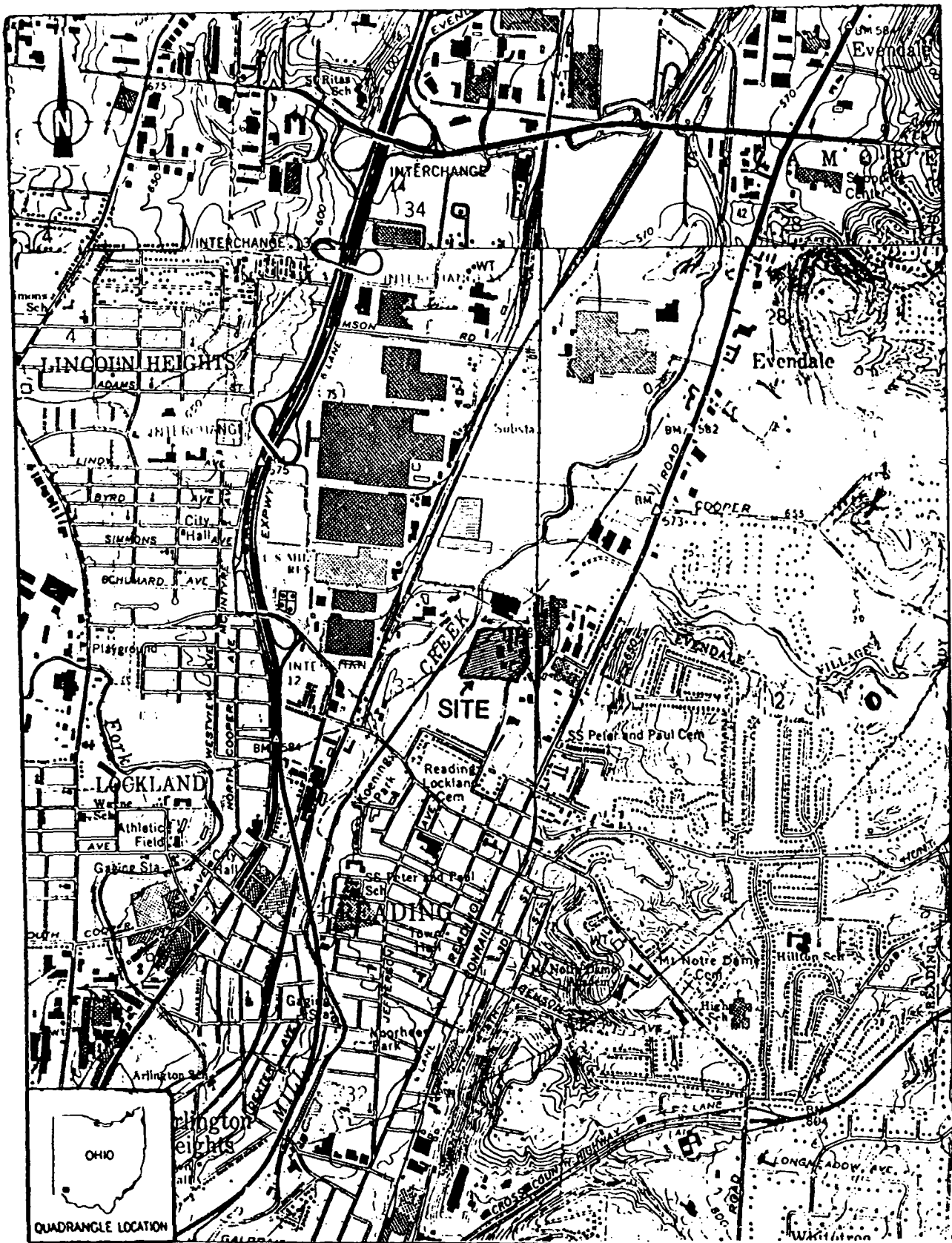
S 1076 May 18, to increase public understanding of the natural environment and to advance and develop environmental education and training (Burdick and others) to Environment.

S 1002 May 16, to amend the Solid Waste Disposal Act (Durenberger and others) to Environment.

### House Bills And Resolutions Introduced

HR 2417 May 18, to prohibit the transportation of certain hazardous substances in crude oil pipelines (Inhofe) jointly to Energy and Commerce and Public Works.

HR 2423 May 18, to provide for the safe operation of tanker traffic in Puget Sound, to improve responses to oil spills in Puget Sound (McDermott and Dicks) jointly to Merchant Marine and Public Works.

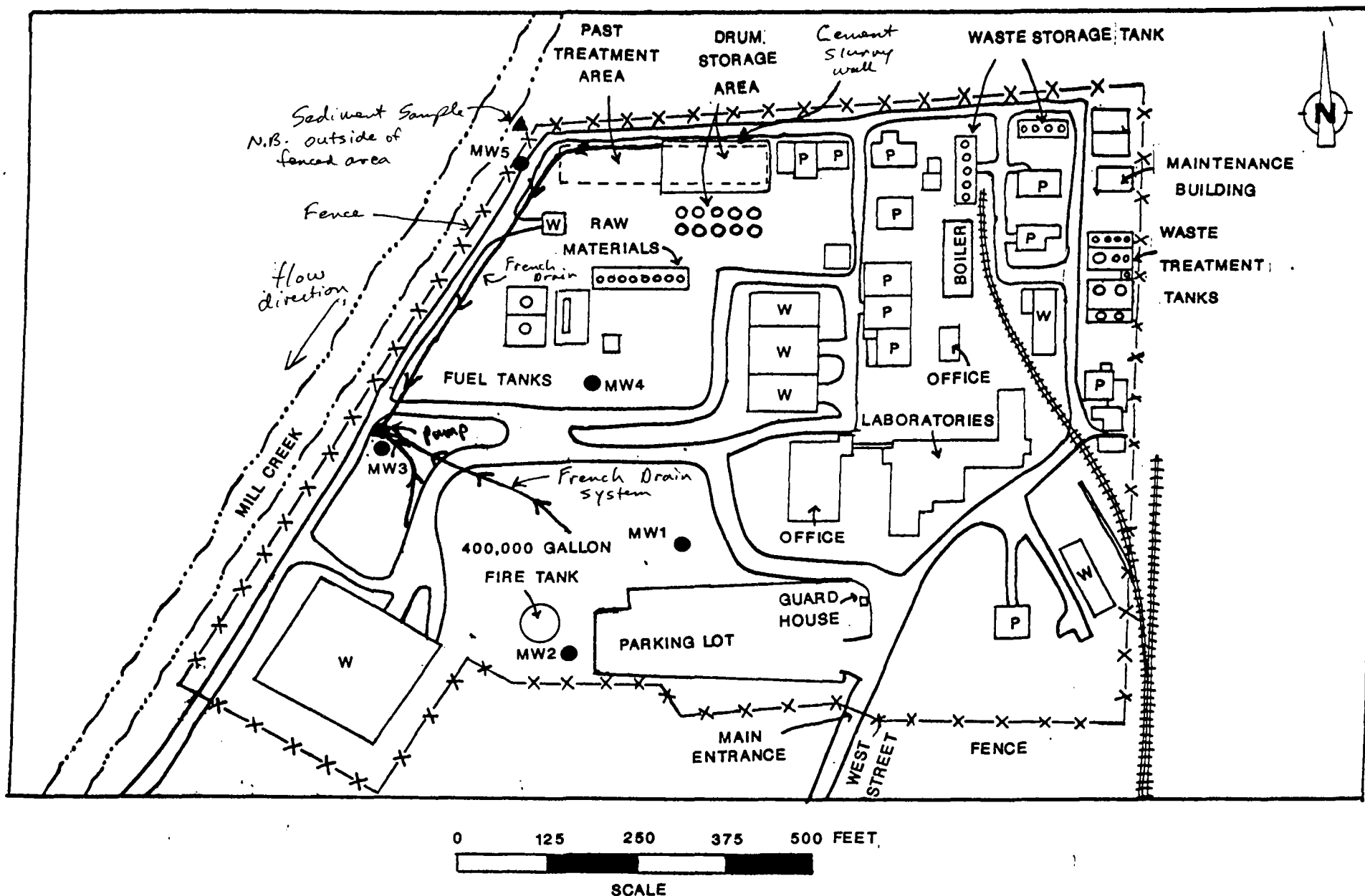


SOURCE: USGS, Glendale, OH Quadrangle, 7.5 Minute Series, 1965, photorevised 1982, Cincinnati East, OH Quadrangle, 7.5 Minute Series, 1961, photorevised 1981.



FIGURE 2-1 SITE LOCATION

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Note: P denotes Production Building  
W denotes Warehouse

FIGURE 3-1 SITE FEATURES